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*Attorney for Defendants William Rogers and  
Harbor Freight Tools USA, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

DAN GOULD, an individual, and AUDREE  
GOULD, an individual,

Plaintiffs,

vs.

WILLIAM ROGERS, an individual,  
HARBOR FREIGHT TOOLS USA, INC.,  
a California Corporation, DOES I through  
X, inclusive, and ROE CORPORATIONS I  
through X, inclusive,

Defendants.

Case No. 2:17-cv-02435-APG-NJK

**STIPULATION AND ORDER TO  
CONTINUE RESPONSE TO  
PLAINTIFFS' COMPLAINT AND  
MOTION FOR REMAND**

**[FIRST REQUEST]**

Plaintiffs Dan and Audree Gould, and Defendants William Rogers ("Rogers") and Harbor Freight Tools USA, Inc. ("Harbor Freight," together with Rogers, "Defendants"), through their respective counsel, stipulate for the first time to continue Defendant Rogers' response to Plaintiffs' Complaint and Defendants' response to Plaintiffs' Motion for Remand, ECF No. 10, as follows:

WHEREAS, Plaintiffs served Defendant Rogers with the Summons and Complaint on October 6, 2017;

WHEREAS, Defendant Rogers' response to Plaintiffs' Complaint is due October 27, 2017;

WHEREAS, Defendants' response to Plaintiffs' Motion for Remand is due October 30, 2017;

WHEREAS, this request is timely;

WHEREAS, the Parties agreed to provide Defendants' additional time to respond to Plaintiffs' Complaint and Motion for Remand;

WHEREAS, this request is not made for purposes of delay and is supported by good cause;

NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

1. Defendant Rogers will respond to Plaintiffs' Complaint on or before November 10, 2017.

2. Defendants will respond to Plaintiffs' Motion for Remand on or before November 13, 2017.

**IT IS SO STIPULATED.**

DATED: October 25, 2017.

JENNINGS & FULTON, LTD.

By: /s/ Adam R. Fulton  
JARED B. JENNINGS, ESQ.  
ADAM R. FULTON, ESQ.  
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*Attorneys for Plaintiffs*

DATED: October 25, 2017.

SNELL & WILMER L.L.P.

By: /s/ Karl O. Riley  
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*Attorney for Defendants William Rogers  
and Harbor Freight Tools USA, Inc.*

**ORDER**

IT IS ORDERED THAT Defendant Rogers shall respond to Plaintiffs' Complaint on or before November 10, 2017.

IT IS FURTHER ORDERED THAT Defendants shall respond to Plaintiffs' Motion for Remand on or before November 13, 2017.

**IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE  
Dated: October 25, 2017.